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Attorneys for Plaintiff
REGGIE HAMILTON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

REGGIE HAMILTON,

Plaintiff,

vs.

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA, PAMELA E. ROSKOWSKI,
JON EASTERBROOK, BARNEY RIVERA
and DOES 1 through 15,

Defendants.

Case No.: C10-01622 DMR

**STIPULATION AND ~~PROPOSED~~
ORDER RESCHEDULING THE CASE
MANAGEMENT CONFERENCE AND
CONTINUING DISCOVERY
DEADLINES AS MODIFIED**

The parties to the above captioned action hereby stipulate by and through their undersigned counsel of record to request that this court continue the 1:30 p.m. November 2, 2011 Case Management Conference to 1:30 p.m. December 14, 2011, or as soon thereafter as it may please the Court.

The parties also hereby stipulate by and through their undersigned counsel of record to request that this court continue the lay and expert witness discovery deadlines by approximately thirty days as set for the below.

Good cause exists for the above requests, as follows:

1. At the October 11, 2011 settlement conference before Magistrate Judge Joseph C. Spero the parties reached a settlement in principle.
2. At the settlement conference the parties set a three week check-in time (November 1, 2011) with Magistrate Judge Spero.
3. On October 11, 2011 the parties stayed ongoing discovery for three weeks to November 1, 2011 in light of the settlement in principle.
4. The parties are currently working on the details of settlement, some of which require the Regents to seek detailed internal guidance.

5. It is anticipated that a completed settlement agreement will be executed by all parties on or before November 20, 2011, and that the completed settlement agreement will obviate the need for further litigation in the matter.
6. The deadline to complete lay discovery and designate expert witnesses is currently November 7, 2011, and the deadline to complete expert witness discovery is December 5, 2011.
7. The last day to hear dispositive motions is January 5, 2012 and the Final Pretrial Conference Statement and Trial Briefs are due February 4, 2012.
8. Continuing the lay discovery and expert witness disclosure deadline to December 14, 2011 and the completion of expert discovery to January 13, 2012 will allow the parties to focus all of their attention on settlement the matter.

Given all of the above, a continuance of the Case Management Conference and Discovery deadlines will serve judicial economy and spare the parties considerable and likely needless discovery-related expense.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: October 31, 2011

PRICE AND ASSOCIATES

/S/

PAMELA Y. PRICE, ESQ.
Attorneys for Plaintiff REGGIE
HAMILTON

DATED: October 31, 2011

LAW OFFICE OF CURTIS E. ALLEN

/S/

CURTIS E. ALLEN, ESQ.
Attorneys for Plaintiff REGGIE
HAMILTON

1 DATED: October 31, 2011

STUBBS & LEONE

3 _____/S/

4 CLAUDIA LEED, ESQ.
5 Attorneys for Defendants THE
6 REGENTS OF THE UNIVERSITY OF
7 CALIFORNIA,
8 PAMELA E. ROSKOWSKI, JON
9 EASTERBROOK, and BARNEY
10 RIVERA

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10 The 1:30 p.m. November 2, 2011 Case Management Conference is continued to
11 1:30 p.m. December 14, 2011. An updated joint Case Management Conference
12 statement shall be filed by December 7, 2011. The deadline to complete all lay
13 discovery and to designate expert witnesses is continued to December 14, 2011. The
14 deadline to complete expert witness discovery is continued to January 13, 2012.

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16 DATED: _____ November 1, 2011


17 DONNA M. RYU
18 United States Magistrate Judge
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